

WWR# 041565674

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:)	BANKRUPTCY NO. 24-12244-AMC
)	
John Halphen, Jr)	CHAPTER NO. 13
)	
)	
Debtor,)	Related to Document Number 19
)	
)	Hearing Date & Time 12/18/2024 at 10:00 AM
American Heritage Credit Union)	
)	
Respondent.)	

**RESPONSE OF AMERICAN HERITAGE CREDIT UNION TO MOTION TO DETERMINE
VALUE OF PROPERTY**

Now comes, American Heritage Credit Union, by and through counsel, Milos Gvozdenovic and Weltman, Weinberg & Reis, Co., L.P.A. and states the following:

1. On 11/13/2024, Debtor filed a Motion to Determine Value of Property (Doc. 19).
2. American Heritage Credit Union (hereinafter AMHCU) does not oppose the valuation of the collateral at \$12,737.00, but has concerns with the motion contradicting the currently proposed plan which provides for payment of AMHCU's loan directly to AMHCU pursuant to the terms of the loan.

WHEREFORE AMHCU respectfully requests that the Debtor's Motion be denied, or in the alternative, the Motion be granted subject to the Debtor's plan being amended to reflect the terms of the valuation and how AMHCU is to be paid.

WELTMAN, WEINBERG & REIS CO., L.P.A.

/s/Milos Gvozdenovic
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